
Telecommunications Relay Service and Wireless Phones

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November 26, 2002

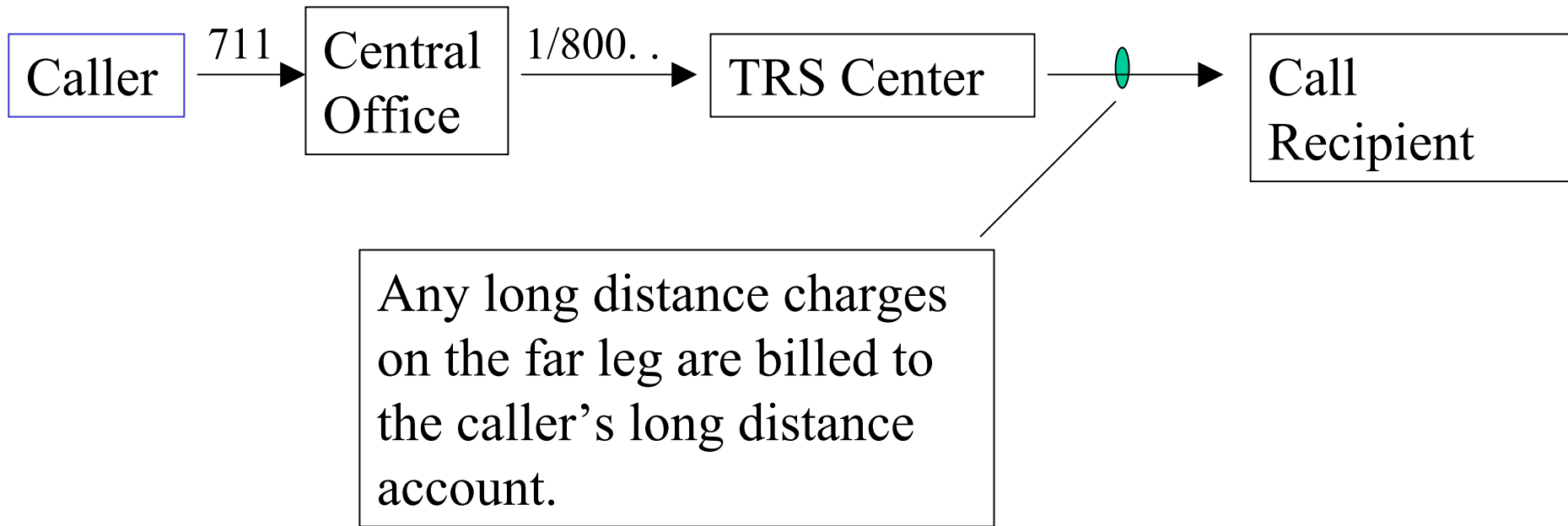
Fundamental Issues

- Wireless is different:
 - Inability to determine jurisdiction of a wireless call
 - Billing associated with the placing of a wireless TRS call
 - Availability of TTY solution in digital wireless handsets and networks

TRS Based on Wireline Model

- Current TRS system was developed on a wireline model
 - TRS system based on state geopolitical boundaries
 - ANI transmitted with the call to identify the specific location of a call, i.e., whether the call is intra- or inter-state
 - This model is not conducive for the handling, delivery and cost recovery of TRS calls in a mobile phone environment

TRS Landline



Current TRS Model Not Designed To Handle Wireless Calls

- Wireless Model
 - CMRS licenses are not coterminous with state geopolitical boundaries
 - Necessary call information may not be transmitted to TRS
 - No method of determining the jurisdictional location of a call, i.e., whether the call is intra- or inter-state

TRS over Wireless



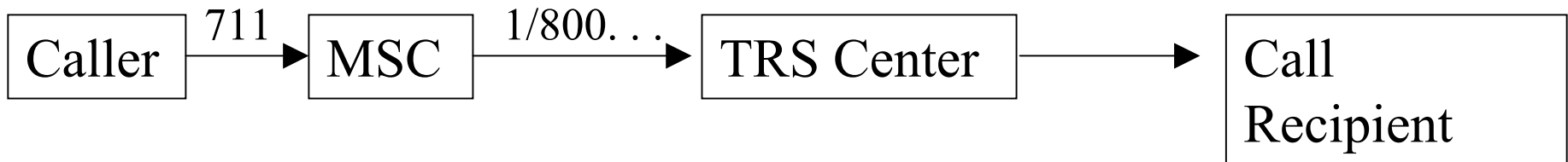
711 calls are sent to the TRS center of the local (serving) switch (MSC).

Wireless bulk rate plans do not assess the customer additional charges for toll or Inter-LATA calls.

In current wireless TRS implementations, long distance charges for the last leg are billed by the TRS Center to the caller's credit card number, if the TRS Center will accept the call.

When TRS centers receive a call, their system may interpret it as a call from outside that TRS's service boundary depending on the capabilities and trunk configuration of the intervening switches.

Wireless/TRS Technical Issues



- Some TRS centers are rejecting calls from wireless phones because there is no means to “bill-back” any tolls associated with the call
- Some TRS centers reject calls because under their state contracts they cannot handle what appear to be calls originating from out of state
- Wireless TRS users do not expect to pay additional long distance charges for calls made within their service plans
 - Under current model it is possible that a wireless TRS caller could be required to pay twice for a toll call

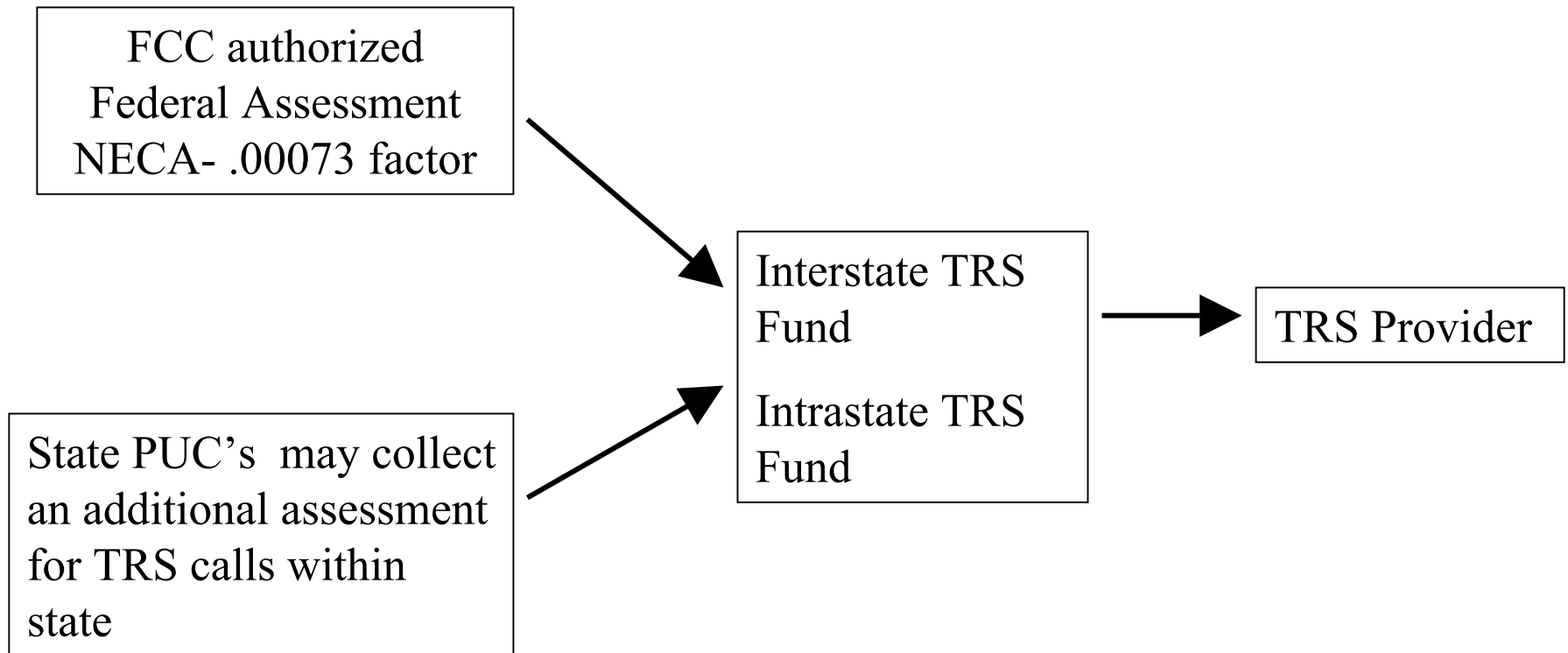
Wireless Industry Not Required to Provide Equal Access to Long Distance Providers

- Equal access requirement for CMRS carriers was repealed by the Telecom Act
- Repeal has allowed wireless carriers to purchase large blocks of minutes from a long distance provider of the CMRS carrier's choice at substantial discounts
- CMRS carriers pass the savings along to their wireless customers in the form of one-rate plans, buckets of minutes, etc...
- Wireless carriers can offer nationwide, virtually seamless service that eliminates "toll" or "long distance" charges for their customers

FCC Should Grant NECA Waiver Request

- Granting the NECA waiver request is consistent with Section 225 of the Communications Act of 1934, as amended, which requires the Commission to “ensure that interstate and intrastate telecommunications relay services are available, *to the extent possible and in the most efficient manner*, to hearing-impaired and speech-impaired individuals in the United States.”
- FCC recently addressed reimbursement of the cost of providing Internet Protocol (IP) relay in its Declaratory Ruling and Second Further Notice of Proposed Rulemaking (WorldCom decision; 67 Fed. Reg. 39863, 2002)

TRS Funding Sources



Cost to TRS Fund

- NECA indicates there are sufficient funds in the Interstate TRS Fund to implement the change without having to impose additional funding requirements on wireless carriers
- Wireless carriers contribute annually to the interstate TRS fund
- CTIA roughly estimates that over a four-year period (1996 – 2000), wireless carriers contributed approximately \$16.3 million dollars to the Interstate TRS Fund

Minutes of Use and Toll Charges

- Approximately 190 million minutes of TRS provided in 1999
- 0.00777% of all minutes processed in both wireline and wireless environments
- Translates into 12 million wireless minutes against a base of 156 billion total minutes
- Approximately 20% or 2.5 million minutes of all calls have an uncollected toll associated with them

Current TRS Compensation

- Approximately 80% of TRS translation minutes are compensated by the State TRS fund and reflect calls that were originated, translated and terminated within the serving state
- In-state compensation rates vary from \$1.00 to \$2.00 minute
- The remaining 20% are compensated by NECA through the TRS Fund, for calls originated, translated and terminated in differing states